



# Supplier Code of Conduct



SWISS PRIME SITE

# Supplier Code of Conduct of the Swiss Prime Site Group

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# 1 Purpose and scope of application

The Swiss Prime Site Group is committed to complying with the Supplier Code of Conduct of the Swiss Prime Site Group. Through its group companies, Swiss Prime Site pursues the goal of pursuing a responsible and customer-orientated procurement policy. This is intended to contribute to assuming financial, ecological and social responsibility together with partner companies, our suppliers and their suppliers. In order to be able to offer our tenants premises and our customers services that are produced responsibly at every stage, this Code was adopted in addition to the Swiss Prime Site Code of Conduct. It is based on the principles of the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights (UNGP) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

This Code must be observed by all suppliers of the Swiss Prime Site Group and all its group companies and their directly or indirectly owned or controlled subsidiaries (hereinafter "SPS companies"). They are required to make proactive, systematic efforts to ensure compliance, including by subcontractors who directly or indirectly provide a service for the Swiss Prime Site Group on their behalf.

## 2 Requirements for suppliers

### **Laws and regulations**

We expect all our suppliers to fully comply with applicable laws, regulations, directives and standards as well as all collective agreements relevant to their business activities and to comply with internationally recognised environmental, social and corporate governance standards (ESG standards). We also expect our suppliers to use their best endeavours to implement these standards at their suppliers and subcontractors. Furthermore, we expect our suppliers to have all the permits, licences and registrations required for their business activities.

### **Business ethics**

We expect all our suppliers to promote free competition and maintain high ethical standards in accordance with good business practices. To ensure that our suppliers adhere to business integrity and ethics, we expect them to design and implement appropriate policies and processes that promote free competition and do not allow any form of corruption, bribery, money laundering or unauthorised restriction of competition.

### **Data protection and information security**

We expect all our suppliers to use specific or confidential information about our business activities or those of our customers only for the intended purpose and not to pass it on to third parties without our consent.

Suppliers must establish and maintain adequate personal data protection and information security for the information they and third parties acting on their behalf process.

Suppliers must operate in a manner that complies with applicable data protection laws and with technical standards for the protection and security of all information, including personal information.

## 3 Environmental guidelines

Swiss Prime Site and its group companies are actively working to continuously reduce the company's direct and indirect environmental impact, and suppliers are obliged to work in accordance with our Environmental Policy. The supplier has knowledge and control over its respective environmental impacts and continuously endeavours to improve the environmental performance of its business activities. The supplier applies the precautionary principle in the selection and documentation of products and has a system in place to ensure that waste is disposed of properly to promote reuse and recycling.

The supplier is responsible for reducing the emissions it causes to air, soil and water and for achieving efficiency improvements in terms of energy and resource consumption. Additional and property-specific specifications (exclusion lists) are included in the relevant contracts for the purchase of building materials for new construction and renovation projects.

## 4 Social guidelines

### **Human Rights**

The Supplier supports and respects internationally proclaimed human rights and treats its employees and subcontractors fairly and in a manner that respects the equal value of all human beings.

### **Discrimination and oppression**

The supplier shall ensure that there is no discrimination in the recruitment, wage setting, training, promotion or dismissal of employees and that any kind of harassment, bullying, intimidation, oppression or other degrading treatment can be ruled out.

### **Freedom of association**

The supplier respects the right of employees to unionise and their ability to bargain collectively without risk of punishment, intimidation or harassment.

### **Conditions of employment**

The supplier shall ensure that

- all employees have written employment contracts (in the respective national or local company language);
- all employees are entitled to statutory leave, including sick leave;
- all employees are entitled to weekly rest periods in accordance with the applicable legislation;
- no deductions are made from wages as a disciplinary measure;
- wages are paid regularly and punctually, directly to employees and in full;
- there is no form of wage discrimination.

### **Forced labour**

The supplier shall ensure that no form of forced labour or labour involving any kind of threat or punishment is used and fully recognises that no employee may be forced to deposit valuables or identity documents with their employer (see ILO Convention No. 29: Forced Labour; ILO Convention No. 105: Abolition of Forced Labour).

### **Conflict minerals**

Swiss Prime Site and its group companies do not import or process minerals and metals (tin, tantalum, tungsten or gold) from conflict and high-risk areas. Swiss Prime Site recognises the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict and High-Risk Areas



(OECD Conflict Minerals Guidance) and expects its suppliers to comply with the relevant legislation (in particular Swiss Code of Obligations Art. 964j ff. and the Ordinance on Due Diligence and Transparency with regard to Minerals and Metals from Conflict-Affected Areas and Child Labour (VSoTr)) as well as the corresponding regulations in the European Union (Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold originating from conflict-affected and high-risk areas).

## **Child labour**

Child labour is not permitted. If there is no national legislation against child labour in the country in which the business activity is carried out, no one under the age of 15 may be employed (see ILO Convention No. 138: Minimum age for employment). Swiss Prime Site recognises the OECD Due Diligence Guidance for Responsible Business Conduct and extends its recognition to third parties commissioned by it and its subsidiaries.

## **Health and safety in the workplace**

The supplier ensures that all employees have a safe working environment and undertakes systematic and preventive efforts (including training) to promote health in the workplace.

Accidents and occupational accidents shall be prevented. The supplier is obliged to immediately report all accidents or incidents that occur while working on behalf of Swiss Prime Site or one of its group companies.

The supplier must ensure that no alcohol or drugs are consumed during working hours and that all persons, regardless of their form of employment or type of contract, are insured against accidents in accordance with local legal requirements.

## **Monitoring and compliance**

Swiss Prime Site conducts training of employees and suppliers to sensitise them to ESG standards and to gain more transparency on the effectiveness of our procurement policy. Suppliers should use management systems to ensure compliance with these standards and achieve continuous improvement. To this end, Swiss Prime Site or a third party commissioned by it is authorised to carry out spot checks at its suppliers in order to be able to assess whether and how the Supplier Code of Conduct is being complied with. In addition, Swiss Prime Site informs all suppliers affected by future amendments to the Code proactively and at an early stage.

Swiss Prime Site endeavours to support its suppliers within the scope of its possibilities in improving its sustainability performance. If Swiss Prime Site identifies violations of the provisions of this Code, the company seeks dialogue with the offending supplier and, by mutual agreement, defines improvement measures with a clear implementation deadline. If these are not implemented as agreed, Swiss Prime Site may terminate the business relationship. In the event of serious violations of this Code, Swiss Prime Site reserves the right to terminate the business relationship immediately.

## 5 Reports

Suppliers must inform Swiss Prime Site immediately if they become aware of misconduct by themselves, their suppliers or associated persons towards Swiss Prime Site or its representatives. If suppliers or other persons observe possible misconduct or anomalies, they can make reports anonymously via the Swiss Prime Site Integrity Platform (<https://sps.integrityline.io/>).

Swiss Prime Site treats all reports confidentially. Swiss Prime Site protects all persons who make a report in good faith and prohibits any retaliatory measures.

## 6 Enactment

The Supplier Code of Conduct for suppliers of the Swiss Prime Site Group will enter into force on 6 February 2024.